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June 15, 2022

BY ECF:

Hon. Katherine Polk Failla District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007



RE: United States v. Erick Rodriguez

Case No.: 21-cr-770 (KPF)

Second Request for a Modification of Release Conditions

Dear Judge Failla:

Please be advised that I represent **Erick Rodriguez** in the above-referenced action. Mr. Rodriguez respectfully requests a temporary modification of his release conditions for two separate trips.

Mr. Rodriguez is requesting a modification of his release conditions permitting him to travel to Miami, Florida from <u>June 17, 2022</u>, to <u>June 23, 2022</u>, for a family trip.

Additionally, upon his return to New York on <u>June 23, 2022</u>, Mr. Rodriguez is requesting permission to travel to Chicago, Illinois from <u>June 24, 2022</u>, to <u>June 26, 2022</u>. The purpose of the trip is to retrieve a dog. Mr. Rodriguez will travel to and from Chicago by vehicle and respectfully requests that the modification permit for travel in districts between the Northern District of Illinois and the Southern/Eastern Districts of New York.

Should Your Honor permit travel, Mr. Rodriguez will make reservations and provide proof of booking and itinerary to Pretrial Services in advance of his departure. Neither Pretrial Services nor the Government object to these requests.

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Thank you for your consideration.

Sincerely, **Spodek Law Group P.C.** /S/ Todd A. Spodek

TAS/az

cc: All Counsel (By ECF.)

Application GRANTED. Mr. Rodriguez is directed to provide proof of booking and itinerary to Pretrial Services in advance of each departure. The Clerk of Court is directed to terminate the pending motion at docket number 27.

Dated: June 16, 2022

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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